

# United States District Court

SEP - 7 2016

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

McAllen Division

David J. Bradley, Clerk

v.

## CRIMINAL COMPLAINT

**Brenda Vianet MARTINEZ-Montes**

Case Number: **11-16-1669-M**

YOB: 1984  
COC: Mexico

Defendant(s)

I, the complainant in this case, state that the following is true to the best of my Knowledge and belief.  
On or about the date(s) of September 6, 2016 in Hidalgo County, in  
the Southern District of Texas, the defendant(s) violated:

21 USC 841 Possession with Intent to Distribute 20.52 kilograms of Cocaine  
21 USC 952 Importation of Controlled Substances, etc

This criminal complaint is based on these facts:

On September 06, 2016, Brenda Vianet MARTINEZ-Montes was detained attempting to enter the United States through the Pharr, Texas Port of Entry with approximately 20.52 kilograms of Cocaine concealed floor board area of the vehicle she was driving.

SEE ATTACHMENT "A"

Continued on the attached sheet and made a part of this complaint:

☒ Yes

☐ No

Sworn to before me and subscribed in my presence,

Approved By: **J. Leonard**



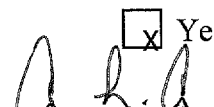
**September 7, 2016**

Date

**8:48 am**

**U.S. Magistrate Judge**

Name and Title of Judicial Officer

  
Signature of Complainant

**Ana L. Aguilera HSI Task Force Officer**  
Printed Name of Complainant

**McAllen, Texas**  
City and State

  
Signature of Judicial Officer

Attachment A

On September 6, 2016, Brenda Viane MARTINEZ-Montez applied for admission into the United States at the Pharr, Texas Port of Entry (POE) as the driver of a 2005 blue Jeep Liberty bearing Mexican license plates (510TRL5). MARTINEZ and her vehicle were subjects of a lookout which indicated subject would attempt to smuggle illegal narcotics into the United States. Due to this lookout and Martinez's extreme nervousness, Martinez and the vehicle were referred to secondary for further inspection.

U.S. Customs and Border Protection (CBP) Officers conducted an x-ray examination which revealed anomalies in the floor board area. A canine examination was conducted yielding a positive alert for the presence of the odor of narcotics. A probing of the area extracted a white powdery substance which tested positive for Cocaine. CBP Officers removed a total of 18 packages of Cocaine, weighing 20.52 kilograms, from the area in question.

CBP Officers contacted Homeland Security Investigations (HSI) Special Agent Michael Blackwood. At approximately 1330 hours, HSI Special Agent Blackwood, along with HSI Task Force Officer Ana Aguilera, and Jesus Cuellar arrived at the Pharr POE. Officers read MARTINEZ her Miranda Rights in the Spanish Language. MARTINEZ agreed to speak with agents without the presence of an attorney. During her post Miranda statement, MARTINEZ claimed that she responded to a job offer posted on Facebook. MARTINEZ stated that she was hired as a driver to transport what she thought was illegal currency into the United States. MARTINEZ further stated that she had knowingly transported what she assumed was hidden currency once before, having being paid \$300 US dollars for that venture. MARTINEZ admitted that she suspected that it could be illegal narcotics that she was transporting. MARTINEZ stated that she entered into this agreement for financial gain.